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REMARKS/ARGUMENTS

The foregoing amendments and the following remarks are responsive to the July 11, 2007 Office Action for the above-identified patent application.

Claims 1-7 were previously in this application. Claim 1 is amended herein. Claims 2–6 are canceled herein and are replaced with new Claims 8-12. Claim 7 remains as previously presented. Thus, Claims 1 and 7–12 are presented herein for further consideration.

Brief Summary of the Amended Set of Claims

Previously presented Claims 2–6 depended from Claim 7. In order to obviate any confusion with respect to claims depending from a higher numbered claim, Claims 2–6 are canceled herein and are replaced with new Claims 8–12. New Claims 8–12 generally correspond to previously presented Claims 2–6, respectively, however, new Claims 10–12 incorporate changes that are responsive to the rejections under 35 U.S.C. § 112, second paragraph, as discussed below. Claim 1 is amended herein to provide consistent antecedent bases for the dependent claims.

Response to rejection of previously presented Claim 4 under 35 U.S.C. § 112, second paragraph

The Examiner rejects previously presented Claim 4 under 35 U.S.C. § 112, second paragraph, as being indefinite for using the phrase "and/or." The Examiner also rejects previously presented Claim 4 for reciting the limitation "the respective forwarding and/or distribution advice in line 5 without providing sufficient antecedent basis for the limitation.

New Claim 10 corresponds to previously presented Claim 4; however, the phrase "forwarding and/or distribution advice" is replaced with "new advice comprising at least one of forwarding advice and distribution advice" to provide the same intended meaning without using the phrase "and/or." The limitation "new advice" is used consistently

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throughout new Claim 10, thereby eliminating the basis for the Examiner's second stated reason for rejecting previously presented Claim 4.

In view of revised language in new Claim 10, Applicant respectfully requests the Examiner to withdraw the rejection under 35 U.S.C. § 112, second paragraph, as applied to previously presented Claim 4.

Response to rejection of Claim 5 under 35 U.S.C. § 112, second paragraph

The Examiner rejects previously presented Claim 5 under 35 U.S.C. § 112, second paragraph, as being indefinite for using the phrase "and if not" in line 9 and the phrase "and if so" in line 11. The Examiner also rejects previously presented Claim 5 on the basis that the phrase "the changed position" in the second to the last line is unclear because there is no reference to changing the position prior to the limitation.

Previously presented Claim 5 is replaced herein with new Claim 11. The phrase "and if not" and the phrase "and if so" in previously presented Claim 5 are removed and replaced in new Claim 11 with clauses that clearly introduce the basis for performing each of the alternative steps in Claim 11. The phrase "the changed position" in previously presented Claim 5 is removed and replaced with the "transmitted position" in new Claim 11. The antecedent basis for the "transmitted position" is provided earlier in Claim 11.

In view of revised language in new Claim 11, Applicant respectfully requests the Examiner to withdraw the rejection under 35 U.S.C. § 112, second paragraph, as applied to previously presented Claim 5.

Response to rejection of Claims 1-2 and 5-7 under 35 U.S.C. § 102(b)

The Examiner rejects Claims 1-2 and 5-7 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,682,429 to Cordery et al. ("Cordery").

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Claim 1 is patentably distinguished over Cordery

With respect to Claim 1, the Examiner first states that:

Cordery teaches a method for automatically generating current distribution order data with the inclusion of central address directories, which are stored in databases and are transmitted by electronic data transfer, as distribution order data.

Applicant respectfully disagrees with the Examiner's initial statement. As discussed in the responses to the previous Office Actions, Cordery does not provide any teaching whatsoever regarding the generation of distribution order data. The Examiner's previous citation of the data center 910 in Figure 9 in support of the inclusion of central address directories is not relevant to the patentability of Claim 1 since the claimed invention is directed to a method for keeping distribution order data up to date at a local level. As discussed in the specification, Applicant's invention is able to implement local changes immediately in response to changes of addresses and in response to changes in the availability of the delivery personnel. Changes of address in a central data center such as described in Cordery are not effective if the item to be delivered is already at the local delivery section with incorrect address data, for example, or if the central data center dictates a delivery order which cannot be accommodated by the local delivery section when the item arrives at the delivery section.

Further with respect to Claim 1, the Examiner states that Cordery teaches:

locally copying (Abstract, line 3-5 and line 18-20 and col. 3 line 12-21 and line 36-39; use of a local network) a current central address directory (col. 2 line 11-15, col. 4 line 32-33, drawing reference 110) or parts relating to a relevant area (col. 4 line 33).

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As best can be determined from the foregoing citations, which do not appear to include the correct beginning and ending line numbers, the Examiner is citing portions of the following language of Cordery in support of the rejection:

The list is transmitted to a data center. Received from the data center is a mailing list including addressed hygiened recipient address information and a digital token for each mailpiece with encrypted data.
[Abstract at lines 3-6]

The encrypting means for generating digital tokens may be located remote from the mailer facility or on a mailer facility or other local area network.
[Abstract at lines 17-19]

In accordance with another feature of the present invention, recipient address information may be communicated from a first location at a mailers facility over a local area network to means for encrypting at a second location at the mailer facility. The encrypting means is protected by a tamper resistant housing and coupled to the local area network. The encrypting means contains encryption algorithm information. The encryption means generates encrypted data based on the communicated recipient information and the encryption algorithm information. The encrypted data is transmitted from the encryption means over the local area network to the mailer facility first location.
[Column 3 at lines 10-23]

A mail list is created including mailpiece recipient address information for each mailpiece. The mailing lists includes correct recipient address information and incorrect recipient address information. The mailing list is transmitted to a data center.
[Column 2 at lines 11-15]

These databases include a compilation of all address for a given region, area or even an entire country.
[Column 4 at lines 31-32]

Applicant respectfully submits that the foregoing citations do not support the Examiner's rejection.

The cited portions of Cordery describe a system having a data center with a central database. A user sends a mailing list to the data center where the mailing list is used to generate encrypted tokens, which are sent back to the user so that the user can

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use the digital tokens on the mailpieces to enter the postal system. For example, the digital tokens are described in column 1 at lines 18-20 as follows:

> A digital token is encrypted information that authenticates the information imprinted on a mailpiece including postal value.

Cordery's data center communicates with the Post Office and with a mailer. The maintenance of a single data "center" that stores the postal address database and a national change of address database teaches away from Applicant's claimed system in which the current central address directory or parts relating to a relevant area are copied locally. Cordery does not teach that any portion of the central database is copied locally to be used to generate distribution order data.

The Examiner's citations do not teach or suggest *locally copying a current central address directory or parts relating to a relevant area,* as used in Claim 1. If the Examiner maintains this stated basis for supporting the rejection, Applicant respectfully requests the Examiner to quote the language in the citations that provides the support.

Further with respect to Claim 1, the Examiner states that Cordery teaches:

> *locally storing change instructions (drawing reference 710) regarding a relative positional change for delivery points (col. 4 line 62-63, col. 8 line 61-62) in the distribution order (abstract, mailing list) for a previous version (col. 8 line 62; original address) of the central address directory (col. 2 line 11-15, col. 4 line 32-33, drawing reference 110) or of the parts.*

Applicant respectfully disagrees with the Examiner's characterization of the teachings of Cordery with respect to this element of Claim 1.

The drawing reference 710 in Figure 7A is an address hygiene step performed at the data center if the user who submitted a mailing list requests address hygiene. As illustrated in Figure 7A, if address hygiene is performed, an incorrect address is corrected if possible, and the corrected address is included in the file that generates the

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postage. The drawing reference 710 has nothing whatsoever to do with locally storing change instructions.

Column 4 at lines 62-63 (actually lines 61-63) and column 8 at lines 61-62 do not describe a relative positional change for delivery points. In particular, the cited portions of Cordery read as follows:

> *A change of address data base may also be included to correct address changes which may not be known to the mailer unit 112 as well as a data repository.*
> [Column 4 at lines 61-63]

> *If the address hygiene parameter switch is actuated, a further parameter switch is available to determine whether the system is to use any corrected hygiened address (that is a changed address) as opposed to the original address in generating the digital token to be imprinted on the mailpiece.*
> [Column 8 at lines 59-63]

A change of address database does not include information that defines positional changes for delivery points. A change of address data base is used to endeavor to provide the correct address on a mailpiece that is going to be entered into the postal system. The address information in such a database does not control how the mailpiece will be handled when it reaches the post office that will deliver the mailpiece to the ultimate destination. Rather, as described in the current application, the positional information is used to determine how the mailpieces at the delivery post office are sorted so that the mailpieces are delivered in an order intended to provide efficient delivery.

The "original address" referenced in Cordery in column 8 at line 62 is an original address in the mailing list submitted to the data center in contrast to the hygiened address (changed address) provided by the data center if address hygiening is performed. Neither the original address nor the hygiened address provides any information regarding a distribution order at the delivery post office. Thus, the original address and the hygiened address of Cordery are not relevant to Claim 1.

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As discussed above, the Examiner's citation of column 2 at lines 11-15 has no relevance whosoever to the local storage of change instructions or to a local copy of a central address directory since Cordery never discusses a local copy of the directory where a distribution order is produced. The cited language reads as follows:

A mail list is created including mailpiece recipient address information for each mailpiece. The mailing lists includes correct recipient address information and incorrect recipient address Information. The mailing list is transmitted to a data center.
[Column 2 at lines 11-15]

Similarly, the following citation from column 4 at lines 31-32 refers to the centralized database at the data center and does not refer to any local copies of the database:

These databases include a compilation of all address for a given region, area or even an entire country.
[Column 4 at lines 31-32]

The reference 110 in Figure 1 is a memory storage device located at the data center, as described in column 5 at lines 2-3, and does not have any relevance to local storage of address information or distribution order.

Further with respect to Claim 1, the Examiner states that Cordery teaches:

transferring the change instructions (col. 5 line 26-27, drawing reference 710, postal database of figure 1) to the local copy of the current central address directory (col. 2 line 11-15, col. 4 line 32-33, drawing reference 110) or parts.

The Examiner's citation of Cordery for this basis for the rejection is not supported by Cordery. In particular, Column 5 at lines 26-27 of Cordery reads as follows:

At the post office 114, a postal data base is maintained as Is address and a change of address data base.
[Column 5 at lines 26-27]

As discussed above, the database maintained by the data center and the database maintained by the post office where the mailpieces enter the postal system comprise lists of addresses and any changes in the address that are used to verify

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mailing lists and to generate postage tokens. Cordery does not disclose or suggest any change instructions applied to the database in either location that relate in any manner to the positional changes for delivery points in a distribution order. Neither location would have any information that suggests how the mailpieces that arrive at a destination post office are to be delivered on a given day in view of circumstances unique to the delivery post office. The Examiner's citation is not relevant to Claim 1.

As further discussed above, the Examiner's citation of column 2 at lines 11-15, column 4 at lines 32-33 and the drawing reference 110 are not related to the local copy of the central address directory as defined in Claim 1.

Further with respect to Claim 1, the Examiner states that Cordery teaches:

> *performing a check (drawing reference 716) so as to determine whether the change instructions have already been implemented (drawing reference 716, true) in the current address directory or whether the instructions are yet to be executed (drawing reference 716, false).*

Applicant respectfully disagrees with the Examiner's characterization of the drawing reference 716 in Figure 7A. The drawing reference 716 does not perform a function that determines whether "change instructions have already been implemented" or whether "change instructions are yet to be executed." The drawing reference 716 must be understood in the context of Figure 7A, which illustrates the processing performed by the data center as the data center processes the address on each mailpiece in a mailing list in order to determine the postage to encode at the token for the particular mailpiece. A decision block 706 determines whether the data center has completed the processing of all the records received in a postal request from a mailer. The postal request is simply a mailing list, which does not include any change instructions. If address hygiene for the current record is requested, the data center performs the address hygiene routine in the block 710 by comparing the address in the current record to acceptable addresses. If the address is correct (e.g., the address exactly corresponds to an address in the postal address database), the address as

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received from the mailer is appended to the postal revenue block (PRB) file in the block 714.   Otherwise, if the address was not correct as received, the decision block 716 (cited by the Examiner) determines whether the address was corrected by the address hygiene block 710 or whether the address hygiene block 710 was not able to correct the address. If the address was not corrected, the record is appended to a bad address file to send to the mailer and no postage token is generated for the uncorrected address. Otherwise, if the address was corrected, the data center adds the corrected address to a corrected address file to send to the mailer. The data center further determines whether to append the corrected address to the PRB file or whether to append the original address to the PRB file. The decision block 716 does not perform a check so as to "determine whether the change instructions have already been implemented in the current address directory or address directory parts or whether the instructions are yet to be executed." Rather the decision block 716 determines whether an address was corrected by the hygiene process when an incorrect address was found. The hygiene process is an automatic process that compares addresses on a mailing list with current addresses in a database.   The hygiene process is not responsive to any change instructions.

Further with respect to Claim 1, the Examiner states that Cordery teaches:

> storing valid change instructions (drawing reference 716) yet to be executed in an audit file (drawing reference 706 and col. 8 line, 51-67 and fig. 6-7).

Applicant respectfully disagrees with the Examiner's characterization of Figures 6 and 7, the drawing references 706 and 716, and the cited text. As discussed above, the reference 710 of Cordery does not disclose or suggest change instructions, valid or otherwise. Rather, the reference 710 is a function than compares each address in a mailing list with a database of addresses and determines whether the address is valid. No change instructions are involved with this process.

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Column 8 at lines 51-67 read as follows:

At 602 a determined postage request is initiated and certain particular parameters associated with the process are either switched to an active or inactive state. Specifically, at 602 a determination is made by the user whether address hygiene is to be performed. The address information may not be susceptible to address hygiene due to either a lack of appropriate address information or due to mailer's desire to keep due address information in its original uncorrected form. If the address hygiene parameter switch is actuated, a further parameter switch is available to determine whether the system is to use any corrected hygiened address (that is a changed address) as opposed to the original address in generating the digital token to be imprinted on the mailpiece. This parameter switch is utilized so that a user has the option of using the uncorrected address for a particular mailpiece but still be advised of the fact that the address hygiened data base carries with it a different hygiened address.

The postal request file described in the foregoing citation from column 8 at lines 51-67 is generated one record at a time by the mailer. The mailer receives a request for postage for a mailpiece, determines whether address hygiene is to be performed on the mail piece, and adds the request for postage to a postal request file to send to the data center. There is no basis for the Examiner's characterization of the postal request file of Cordery as an audit file and no basis for the Examiner's characterization of the information stored in the postal request file as valid change instructions.

The reference 706 also does not disclose or suggest an audit file. The reference 706 represents a decision block that checks to determine whether any further unprocessed records are in the postal request file. The unprocessed records are not change requests, and the decision process performed by reference 706 does not create an audit file.

Further with respect to Claim 1, the Examiner states that Cordery teaches:

executing the change instructions (drawing references 634 and 710)

Applicant respectfully disagrees with the Examiner's characterization of the block 634 of Figure 6 and the block 710 of Figure 7A as executing the change instructions.

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The block 634 is a block that updates a mailing list with a new address that has been corrected by the data center. The mailer is provided an opportunity to replace a previous address with a corrected address, and the block 634 performs the replacement. The block 634 does not execute any form of positional change instruction with respect to a delivery point in a distribution order as defined in the context of Claim 1.

As discussed above, the block 710 performs address hygiene by comparing the address format of a particular record in the mailing list (the postal request) from the mailer with the acceptable address format in the Post Office database. If the format is correct, the record is not altered and the address is stored in the postal revenue block (PRB) file. If the format is incorrect, the block 710 corrects the address if it can be corrected. If the address was corrected, the record with the corrected address is added to a corrected address file. Otherwise, the record with the incorrect address is added to the bad address file. The block 710 is not responsive to any change instructions. Rather, the block 710 operates independently to determine whether the address of the current record is in a correct format. If the block 710 determines that the format is incorrect, the block 710 attempts to correct the address to the proper format.

As set forth in the foregoing discussion, there is no basis for the Examiner's rejection of Claim 1 as being anticipated by Cordery. None of the elements of Claim 1 are present in Cordery. Furthermore, as discussed in the responses to the previous Office Actions, Cordery is directed to a system that generates postage for mail pieces that are entering a postal system from a bulk mailer. In contrast, the claimed invention is directed to the implementation of change instructions to control the distribution order of delivery points to assure the correct delivery of mail pieces that are exiting the postal system regardless of the sources of the mail pieces. Accordingly, Applicant respectfully submits that Cordery is not relevant to Applicant's claimed invention.

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       In view of the foregoing remarks, Applicant respectfully submits that amended Claim 1 is patentably distinguished over Cordery. Applicant respectfully requests the Examiner to withdraw the rejection of Claim 1 based on Cordery, and Applicant further requests the Examiner to allow Claim 1.

Claim 7 is patentably distinguished over Cordery

In the current Office Action, the Examiner does not state any basis for rejecting Claim 7, which depends directly from Claim 1. The remaining dependent claims depend from Claim 7.

Claim 7 further defines the invention defined in Claim 1 as:

> further comprising the step of identifying delivery points according to identification data, the identification data comprising at least a sorting code.

In view of the patentability of Claim 1 over Cordery, Applicant respectfully submits that Claim 7 is also patentably distinguished over Cordery for at least this reason.

Applicant further submits that Cordery does not teach or suggest the limitation defined in Claim 7. In particular, Cordery does not disclose or suggest identifying delivery points according to identification data that comprises at least the sorting code. Thus, Claim 7 is patentably distinguished over Cordery for at least this additional reason.

New Claim 8, derived from previously presented Claim 2, is patentably distinguished over Cordery

With respect to Claim 2, the Examiner states that Cordery teaches:

> the identification data (col. 11 line 47-48) additionally and locally incorporate house number extensions (col. 9 line 55-59).

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New Claim 8 replaces previously presented Claim 2. Claim 8 depends from Claim 7, which depends from Claim 1. For the reasons set forth above, Claim 7 and Claim 1 are patentably distinguished over Cordery. Thus, new Claim 8 is patentably distinguished over Cordery for at least the reasons set forth above.

New Claim 9, derived from previously presented Claim 3, is patentably distinguished over Cordery

The Examiner does not state any reasons for rejecting Claim 3, which is replaced by new Claim 9. New Claim 9 depends from Claim 7 and further defines the invention of Claim 7:

> wherein the identification data additionally and locally incorporates distinguishing remarks.

For the reasons set forth above, Claim 7 and Claim 1 are patentably distinguished over Cordery. Thus, new Claim 9 is patentably distinguished over Cordery for at least the reasons set forth above.

The cited text of Cordery does not disclose or suggest distinguishing remarks. Rather, Cordery describes a system of adding a numeric or alphanumeric string associated with the address, wherein the string is derived algorithmically from the data in the delivery address block. In contrast, the distinguishing remarks in new Claim 10 refer to local information, such as, for example, "butcher's," which are disclosed in the specification of the present application. Such distinguishing remarks are not part of the conventional address that is placed on the mail piece when it enters the postal system, but are instead added for the benefit of the local deliverer. Applicant respectfully submits that new Claim 10 is patentably distinguished over Cordery for at least this additional reason.

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New Claim 11, derived from previously presented Claim 5, is patentably distinguished over Cordery

With respect to Claim 5, the Examiner states that Cordery teaches:

> *updating the central address directory or address directory parts by transmitting only incremental changes by data transfer (figure 7A drawing reference 726 to 710).*

> *the changes being merged (abstract line 1-3) with the previously current and copied address directory (col. 2 line 11-15, col. 4 line 32-33, drawing reference 110) or address directory part by using the identification data (col. 11 line 47-48) for each delivery point (col. 9 line 49-51) to check in the previously current address directory (col. 8 line 62, original address) or address directory part whether the respective delivery point (col. 9, line 49-51) in the incremental change (figure 7A drawing reference 726 to 710) is already present, and if not, incorporating the respective delivery point (drawing reference 718) into the copied address directory (col. 2 line 11-15, col. 4 line 32-33, drawing reference 110) or address directory part at the concomitantly transmitted position of the distribution order (col. 16 line 58-67), and if so, moving the respective delivery point [is moved] to the changed position in the address directory (col. 9 line 52 – hygiene (i.e. corrected) addresses).*

The Examiner further states:

> *In the same field of endeavor, (i.e. i.e. managing mailing lists), it would have been obvious to one of ordinary skill in the data processing art at the time of the present invention to combine the teachings of the cited references because the distinguishing remarks of Allen would have given Cordery an indication of an incorrect address for the benefit of correcting addresses in a mailing list.*

Although the rejection of previously pending Claim 5 appears to be included within the rejections under 35 U.S.C. § 102(b), Applicant first notes that the Examiner is apparently rejecting Claim 5 under 35 U.S.C. § 103(a) since the rejection refers to US Patent No. 5,422,821 to Allen et al. ("Allen") and states that it would have been "obvious" to "combine the teachings" of Allen and Cordery. The following arguments assume that the rejection is under 35 U.S.C. § 103(a).

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New Claim 11, which is derived from previously pending Claim 5, depends from Claim 7, which depends from Claim 1. For the reasons set forth above, Claim 7 and Claim 1 are patentably distinguished over Cordery. Thus, new Claim 11 is patentably distinguished over Cordery for at least the reasons set forth above. Allen does not teach or suggest the limitations that are not found in Cordery and thus does not render Claim 11 obvious.

New Claim 11 is also distinguished over the cited references for the following reasons.

The drawing references 726 to 710 do not teach updating the central address directory or address directory parts by transmitting only incremental changes by data transfer. The Examiner's citation of the reference 726 as the beginning of a sequence of references is not understood since the reference 726 is the "last" operation performed on a record in the postal request file. All operations following the reference 726 to reach the reference 710 are performed on a subsequent record in the file. Notwithstanding the unusual ordering of the references, the references do not teach or suggest the incremental transfer of records. In particular, as clearly taught by Cordery, the entire mailing list is transmitted back to the mailer irrespective of whether any records are corrected. Thus, Cordery does not teach transmitting only incremental changes by data transfer, which is one of the benefits taught in the present application.

The changes made by Cordery are not used to correct the central address directory. Rather, the corrections are made to a mailing list. Cordery does not disclose or suggest determining whether a delivery point in a proposed change is already present. Cordery also does not teach or disclose either incorporating the respective delivery point into the copied address directory or address directory part at the transmitted position of the distribution order or moving the respective delivery point to the changed position in the address directory.

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Allen does not teach or suggest the foregoing elements missing from Cordery. Accordingly, Applicant respectfully submits that new Claim 11 is patentably distinguished over Cordery and Allen for at least these additional reasons.

Applicant further notes that the Examiner's citation of Cordery and Allen as both being in "the same field of endeavor" (i.e., "managing mailing lists") highlights the inapplicability of Cordery as a reference against the claims of the present application. In particular, Cordery does apply to the management of mailing lists, both to assure that addresses are correct and to assure that the correct electronic postage token is applied to each mailpiece. The field of endeavor of Applicant's disclosed and claimed invention is the management of a postal delivery system to assure that the mailed items are delivered from the post office to the destination accurately and efficiently by creating a distribution order and keeping the distribution order current in view of updated address information. As discussed in previous responses, the two fields of endeavor are different because Cordery is directed to the efficient and accurate consolidation of related mailpieces for entry into the postal system, which is in contrast to the present application, which is directed to the efficient and accurate dispersion (distribution) of the unrelated mailpieces exiting the postal system.

New Claim 12, derived from previously pending Claim 6, is patentably distinguished over Cordery

The Examiner does not set forth a basis for rejecting previously presented Claim 6, which is replaced herein by new Claim 12. New Claim 12 depends from new Claim 11 and further defines new Claim 11 as follows:

> wherein the respective delivery point is moved by deleting the
> respective delivery point at the previous position in the local copy of the
> current address directory or address directory part and re-entering the
> respective delivery point at the changed position in the local copy of the
> current address directory or address directory part.

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For the reasons set forth above, new Claim 11, Claim 7 and Claim 1 are patentably distinguished over Cordery. Thus, new Claim 12 is patentably distinguished over Cordery for at least the reasons set forth above.

As discussed in the previous response with respect to previously pending Claim 6, Cordery does not support any rejection of new Claim 12 because Cordery updates the local mailer's address list based on corrections to the address made by the data center. Cordery does not disclose or suggest deleting a delivery point at a previous position and reentering the delivery point at a changed position. More particularly, Cordery does not disclose any operation performed on a delivery point with respect to the position of the delivery point. Accordingly, Applicant respectfully submits that new Claim 6 is patentably distinguished over Cordery for at least this additional reason.

New Claim 10, derived from previously pending Claim 4, is patentably distinguished over Cordery and Allen

Although not explicitly stated in the July 11, 2007 Office Action, the Examiner presumably rejects previously pending Claim 4 under 35 U.S.C. § 103(a) as being unpatentable over Cordery in view of US Patent No. 5,422,821 to Allen et al. ("Allen"). The Examiner acknowledges that Cordery does not teach forwarding and/or distribution advice and the new forwarding and/or distribution advice having priority over the old forwarding and/or distribution advice of a same type, however, the Examiner contends that Allen teaches:

> forwarding and/or distribution advice (col. 2 line 46 and col. 14 line 20-31 [line]) for identifying incorrectly labeled items prior to shipment or delivery to a customer. Furthermore, Allen teaches the new forwarding and/or distribution advice having priority over the old forwarding and/or distribution advice of a same type (col. 15 line 26-31) for updating a change of address.

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The Examiner further states that:

it would have been obvious to one of ordinary skill in the data processing art at the time of the present invention to combine the teachings of the cited references because Allen would have given Cordery forwarding information in the case of [an] incorrectly addressed mailpieces to further correct recipient addresses.

Applicant respectfully traverses the rejection of previously pending Claim 4 as applied to new Claim 10. New Claim 10 depends from Claim 9, which depends from Claim 7, which depends from Claim 1. As set forth above, independent Claim 1 and dependent Claims 7 and 9 are patentably distinguished over Cordery. Allen does not teach or suggest the limitations missing from Cordery. Applicant respectfully submits that new Claim 10 is patentably distinguished over Cordery and Allen for at least the reasons set forth above.

New Claim 10 further defines the invention defined in Claims 9, 7 and 1 as further comprising the step of incorporating new advice comprising at least one of forwarding advice and distribution advice into the local copy of the current address directory or address directory parts.

As further defined in new Claim 10, the method performs a check so as to determine whether the delivery point for the new advice exists in the local copy of the current address directory or address directory part for the distribution order data. The cited portions of Cordery do not teach or suggest determining whether a delivery point a new advice exists, In a local copy of a current address directory or address directory parts for the distribution order data. Rather, the operations disclosed in Cordery are performed at a central location not on a local copy.

In new Claim 10, when the delivery point for the new advice exists in the local copy of the current address directory or address directory parts, the method adds the new advice to the local copy of the current address directory or address directory parts, with the new advice having priority over old advice of a same type. Cordery does not

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teach or suggest adding new advice (forwarding and or distribution advice) to the locally copied address directory since Cordery does not teach or suggest any manipulation or forwarding and/or distribution data.

The method further incorporates a complete change of data for the new advice into the audit file. As discussed above, Cordery does not disclose or suggest an audit file.

The Examiner's statement that Allen "teaches forwarding and/or distribution advice for identifying incorrectly labeled items prior to shipment or delivery to a customer" is not relevant. In particular, Allen teaches a system that scans addresses on mailpieces and compares the addresses to a National Change of Address database to determine whether an address appears in the database. Allen then diverts the incorrectly addressed mailpiece for relabeling in accordance with the new address in the database. Allen, like Cordery, is operating on the mailpieces to provide a correct address before the mailpieces are sent to a destination post office. Allen, like Cordery, has nothing to do with the distribution of the mail at the destination post office in accordance with the delivery points, which are updated to assure efficient delivery.

Accordingly, for at least this additional reason, new Claim 10 is patentably distinguished over the proposed combination of Cordery and Allen.

Applicant respectfully requests the Examiner to withdraw the rejection of previously pending Claim 4 as may be applied to new Claim 10 under 35 U.S.C. § 103(a) and to pass new Claim 10 to allowance.

Comments on Examiner's Response to Arguments

In the July 11, 2007 Office Action, the Examiner responds to Applicant's previous arguments by stating that new grounds of rejection have been made in view of a different interpretation of Cordery and the addition of the Allen reference. The Examiner's "new interpretation" of Cordery by changing the specific citations does not

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change the underlying fact that Cordery does not teach or suggest the elements of Applicant's claims. Allen does not teach or disclose the limitations missing from Cordery. Thus, the proposed combination of Cordery and Allen does not teach or suggest the claims as presently presented. More particularly, the two references do not teach or suggest the claims presented herein.

Summary of response

Applicant has responded to the rejections in the July 11, 2007 Office Action by amending Claim 1, canceling Claims 2-6 and adding new Claims 8-12. Claim 7 remains as previously pending. Amended Clam 1 and new Claims 8-12 are fully responsive to the rejections under 35 U.S.C. § 112, second paragraph. Furthermore, Claims 1 and 7-12 are patentably distinguished over the cited references. Applicant respectfully submits that Claims 1 and 7-12 presented herein for consideration are in condition for allowance, and Applicant respectfully requests the Examiner to allow Claims 1 and 7-12 and to pass this application to the issue process.

Request for telephone interview

The undersigned has made a good faith effort to respond to the objections and the rejections raised in the Office Action so as to place the claims in condition for immediate allowance. Nevertheless, if any undeveloped issues remain or if any issues require clarification, the Examiner is respectfully requested to call the undersigned attorney of record at the telephone number listed below in order to resolve such issues promptly.

Respectfully submitted,

Dated: _____10/9/07_____

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